

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DAVID LEIBOWITZ, BENJAMIN LEIBOWITZ, JASON LEIBOWITZ, AARON LEIBOWITZ, and PINCHAS GOLDSHTEIN,

Plaintiffs,

v.

IFINEX INC., BFXNA INC., BFXWW INC., TETHER HOLDINGS LIMITED, TETHER OPERATIONS LIMITED, TETHER LIMITED, TETHER INTERNATIONAL LIMITED, DIGFINEX INC., PHILIP G. POTTER, GIANCARLO DEVASINI, LUDOVICUS JAN VAN DER VELDE, REGINALD FOWLER, CRYPTO CAPITAL CORP., and GLOBAL TRADE SOLUTIONS AG,

Defendants.

Case No. 1:19-cv-09236 (KPF) (SN)

**DECLARATION OF MICHAEL J. LEE IN SUPPORT OF
MOTION FOR ADMISSION PRO HAC VICE**

I, MICHAEL J. LEE, being duly sworn, hereby depose and say as follows:

1. I am an attorney with the Law Offices of Michael Jason Lee, APLC, 4660 La Jolla Drive, Suite 100, San Diego, California 92122.

2. I submit this declaration in support of my motion for admission to practice *pro hac vice* as counsel for iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited in the above-captioned action.

3. I am a member in good standing of the bars of the State of California and the District of Columbia. My California Bar identification number is 206110 and a current certificate of good standing from the California Bar is attached to this Declaration as Exhibit A. My District of Columbia Bar identification number is 485722 and a current certificate of good standing from the District of

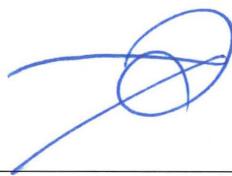
Columbia Bar is attached to this Declaration as Exhibit B. I am also admitted to the United States District Courts for the Central, Eastern, Northern and Southern Districts of California, the United States Court of Appeals for the Ninth and Tenth Circuits, and the Supreme Court of the United States.

4. I have never been convicted of a felony.
5. There are no pending disciplinary actions against me in any state or federal court.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

7. Wherefore, upon the foregoing, I respectfully request that I be granted *pro hac vice* admission in this matter as counsel for iFinex Inc., DigFinex Inc., BFXNA Inc., BFXWW Inc., Tether International Limited, Tether Operations Limited, and Tether Holdings Limited.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 1, 2019
San Diego, California



Michael Jason Lee, Esq.

EXHIBIT A



The State Bar
of California

180 Howard Street, San Francisco, CA 94105

OFFICE OF ATTORNEY REGULATION
& CONSUMER RESOURCES

888-800-3400

AttorneyRegulation@calbar.ca.gov

CERTIFICATE OF STANDING

October 30, 2019

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, MICHAEL JASON LEE, #206110 was admitted to the practice of law in this state by the Supreme Court of California on January 3, 2000 and has been since that date, and is at date hereof, an ACTIVE licensee of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Trustees or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature in black ink, appearing to read "D. Velasco".

Denise Velasco
Custodian of Records

EXHIBIT B



On behalf of JULIO A. CASTILLO, Clerk of the District of Columbia Court of Appeals,
the District of Columbia Bar does hereby certify that

Michael Jason Lee

was duly qualified and admitted on May 10, 2004 as an attorney and counselor entitled to
practice before this Court; and is, on the date indicated below, an Active member in good
standing of this Bar.

In Testimony Whereof,
I have hereunto subscribed my
name and affixed the seal of this
Court at the City of
Washington, D.C., on October
31, 2019.

Julio A. Castillo

JULIO A. CASTILLO
Clerk of the Court

Heubin

Issued By:
District of Columbia Bar Membership